

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J.

8/8/2024

The parties shall submit the joint status letter and Case Management Plan by October 3, 2024.

The parties need not engage in discovery until the Court approves a Case Management Plan and Scheduling Order.

The case shall be removed from the Court's mediation program.

EPSTEIN
BECKER
GREEN

Attorneys at Law

Shira M. Blank
t 212.351.4694
f 212.878.8600
sblank@ebglaw.com

August 7, 2024

VIA ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court, Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Brandon Cooper v. The Office of the Commissioner of Baseball, et al.*
Case No.: 1:24-cv-03118-VSB

Dear Judge Broderick:

This firm represents defendants The Office of the Commissioner of Baseball and PDL Blue, Inc. (collectively, "Defendants") in the above-referenced matter. We write, jointly with Plaintiff Brandon Cooper's counsel, to respectfully request a stay of discovery and all pending deadlines up to and including October 3, 2024. Concurrently, we respectfully request that the joint letter pursuant to the Order and Notice of this Court, dated July 12, 2024 (Doc. No. 14), due August 23, 2024, also be adjourned accordingly. This is the parties' first request for a stay of discovery and second request for an adjournment of the deadline to file the joint letter (Doc. Nos. 15 & 16). The requested extension will not impact any other currently scheduled dates.

We make this request to allow the parties the opportunity to pursue an amicable resolution of the matter without the need for further litigation. We have engaged in preliminary settlement discussions and have scheduled private mediation on September 26, 2024 to see if we can reach a resolution. Thus, pursuant to the Mediation Program Procedures ¶ 3(b), we also respectfully request that this matter be removed from the Mediation Program as we have retained an independent mediator. We will notify the Mediation Office of this request and, in the event our requests are granted, will update the Court to the extent that the parties reach an agreement.

We thank the Court for its consideration of these requests.

Respectfully submitted,

/s/ Shira M. Blank

Shira M. Blank